

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY, AARON WOLKIND, STEVE HARTLEY, RICHARD SCHWETZ, JOBEL BARBOSA, MATTHEW REIDINGER, JOHN HUGO, SEAN-MICHAEL DAVID SCOTT, THOMAS LOUDEN, ZACHARY REHL, AMANDA REHL, K.R., a minor, by and through her father ZACHARY REHL, and her mother AMANDA REHL, MARK ANTHONY TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON; ST. LAWRENCE UNIVERSITY; TRIBUNE PUBLISHING COMPANY; NEW YORK DAILY NEWS; VIJAYA GADDE; TWITTER, INC; COHEN, WEISS AND SIMON, LLP,

Defendants.

CIVIL ACTION
NO.: 2:20-cv-12880-
JMV-JAD

Hon. John M.
Vazquez, U.S.D.J.

Oral Argument
Requested

Return Date:
July 6, 2021

PLEASE TAKE NOTICE that on July 6, or on a date and time to be set by the Court, Defendants Christian Exoo (“Defendant”), by and through his attorneys, The Marlborough Law Firm, P.C., the Law Office of Zachary Margulis Ohnuma and Richard Torres, Esq. shall move before the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for the entry of an Order pursuant to F.R.C.P. Rules 12(b)(2) and 12(b)(6) dismissing with prejudice Counts II, III, IV,

V, VI, VIII, IX, X of Plaintiff's Complaint and the Cross-claims filed by Co-Defendant Cohen, Weiss and Simon, LLP.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, Defendants shall rely upon the Memorandum and Declaration of Richard Torres submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.



Dated: April 22, 2021

By: /s/
Richard Torres

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